

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE REALTY MANAGEMENT, INC.,)	Docket No. 04-333 ERIE
)	(Judge Sean J. McLaughlin)
)	
Plaintiff)	ELECTRONICALLY FILED PLEADING
)	
vs.)	PLAINTIFF'S MOTION FOR SUMMARY
)	JUDGMENT
)	
JOHN ALLIN d/b/a ALLIN COMPANIES and SNOW MANAGEMENT GROUP,)	Filed on behalf of: Plaintiff, Heritage Realty
)	Management, Inc.
)	
Defendant)	Counsel of record for this party:
)	
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PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT

Pursuant to F.R.C.P. 56 and L.R. 56.1, plaintiff, Heritage Realty Management, Inc., hereby moves for summary judgment against defendant, John Allin, and respectfully requests the entry of judgment in the amount of \$340,482.90, plus interest from October 13, 2004, and costs of suit. No genuine issue of material fact remains for trial and plaintiff is entitled to judgment as a matter of law.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo, Esq.

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